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MEMORANDUM ENDORSED

A PROFESSIONAL LIMITED LIABILITY COMPANY

April 27, 2020

Via ECF Only

Honorable Judge Gregory H. Woods
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 12C
New York, New York 10007

RE: Priscilla Wheeler v. Enable Healthcare and Priyanka Patel, In Her Individual and Official Capacities,
Docket No. 20-CV-01847 (GHW) (OTW)
First Request to Adjourn the Initial Pretrial Conference

Dear Judge Woods:

This office represents Plaintiff Priscilla Wheeler ("Plaintiff") in the above-referenced matter. Respectfully, Plaintiff writes the Court pursuant to Your Honor's Individual Rule 1(E) to request that the Initial Pre-Trial Conference currently scheduled for May 13, 2020 at 3:30 p.m. to be adjourned for 45 days for the reason stated below.

The Complaint was filed on March 2, 2020. The matter was promptly sent out for service on or about March 4, 2020. However, due to the COVID-19 pandemic, our process servers are no longer able to serve anyone at this time, due to social distancing requirements. On April 23, 2020, Plaintiff's counsel reached out to Defendants' CEO to obtain contact information for their counsel. In response, Plaintiff was provided with an individual who would be representing them. Despite following up with said counsel, as of the writing of this letter, Plaintiff has not received a response regarding waiver of service. However, we wanted to make sure that the Court was informed of the above in the interim.

Accordingly, if the Court permits, Plaintiff respectfully requests that the Court grant the Parties 45 days to sort out service and to provide Counsel for Defendants time to prepare a response/answer, or to contact the Court to notify Your Honor about any issues Defendants may have.

This is the Plaintiff's first request for an adjournment of the Initial Pre-Trial Conference and no previous applications for similar relief has been made to date. At this time, Plaintiff has not been able to obtain consent from opposing counsel to make this application.

We thank Your Honor for your time and consideration.

Respectfully Submitted,

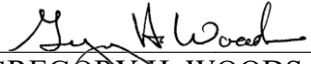
By: /s/ Gregory Calliste, Jr.
Gregory Calliste, Jr.
Yusha D. Hiranman

Application granted. The initial pretrial conference in this case is adjourned to July 2, 2020 at 3 p.m. The joint letter and proposed case management plan described in the Court's March 3, 2020 order, Dkt No. 5, are due no later than June 25, 2020.

The Clerk of Court is directed to terminate the motion pending at Dkt No. 7.

SO ORDERED.

Dated: April 27, 2020



GREGORY D. WOODS
United States District Judge